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Attorneys for Defendant General Security Indemnity Company of Arizona

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CHARM HOSPITALITY LLC D/B/A
WINGATE BY WYNDHAM ELKO,

Plaintiff,

v.

GENERAL SECURITY INDEMNITY
COMPANY OF ARIZONA,

Defendant.

Case no. 2:23-cv-00228-RFB-BNW

**DEFENDANT GENERAL SECURITY INDEMNITY COMPANY OF ARIZONA'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE ANSWER TO
AMENDED COMPLAINT**

NOW COMES Defendant General Security Indemnity Company of Arizona ("General Security") by and through its attorneys Hutchison & Steffen, PLLC and Walker Wilcox

1 Matousek LLP and for its Unopposed Motion for Extension of Time to File Answer to
2 Plaintiff's Amended Complaint (the "Motion"), states as follows:

3 1. On October 20, 2023, Plaintiff Charm Hospitality, LLC filed a motion for leave
4 to file its first amended complaint adding another plaintiff. *See* ECF No. 23.

5 2. On November 2, 2023, General Security filed its opposition to Plaintiff's
6 motion for leave. *See* ECF No. 24.

7 3. On May 23, 2024, this Court granted Plaintiff's motion and permitted Plaintiff
8 to file its first amended complaint. *See* ECF No. 41.

9 4. In its order, the Court also extended all discovery deadlines by 90 days in order
10 to permit General Security to retain new local counsel because of a potential conflict presented
11 by Plaintiff's first amended complaint.

12 5. On May 28, 2024, Plaintiff filed its First Amended Complaint. *See* ECF No. 42.

13 6. Pursuant to Federal Rule of Civil Procedure 15, General Security's answer was
14 due on June 11, 2024.

15 7. Due to difficulties retaining new local counsel, General Security was unable to
16 file its response to the Amended Complaint by June 11 and requests an extension of 14 days to
17 respond. The new responsive deadline would be June 25, 2024.

18 8. Plaintiff's counsel has agreed to the extension and does not oppose this Motion.

19 9. This Motion is not made for any improper reason or to cause undue hardship or
20 delay.

21 WHEREFORE, General Security respectfully requests that this Court grant this Motion
22 and permit General Security to file its response to the Amended Complaint on or before June
23 25, 2024.
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1 Dated this 12th day of June 2024.

2 HUTCHISON & STEFFEN, PLLC

3 /s/ Todd L. Moody

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21 *Attorneys for Defendant General Security*
22 *Indemnity Company of Arizona*

23 IT IS SO ORDERED:

24 
25 UNITED STATES MAGISTRATE JUDGE

26 DATED: June 13, 2024
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28

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2024, the foregoing document was served via electronic service through the United States District Court for the District of Nevada's ECF System upon each party in the case who is registered as an electronic case filing user with the Clerk.

/s/ Shaun L. Bruce
